

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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E.C., individually, and as Next Friend to His Child, R.C.;
F.F., individually, and as Next Friend to Her Child, Y.F.,
J.G., individually, and as Next Friend to Her Child, A.G.;
Z.A., individually, and as Next Friend to His Child, S.A.;
D.G., individually, and as Next Friend to Her Child, J.G.;
N.H., individually, and as Next Friend to Her Child,
L.H.; R.S., individually, and as Next Friend to Her Child,
D.B.S.; Y.A., individually, and as Next Friend to His
Child, B.A.; H.C., individually, and as Next Friend to
Her Child, A.L.; S.C., individually, and as Next Friend to
Her Child, M.C.; K.E., individually, and as Next Friend
to Her Child, G.E.; A.F., individually, and as Next
Friend to Her Child, L.F.,

Plaintiffs,

-against-

The Board of Education of the City School District of the
City of New York; New York City Department of
Education; Chancellor Melissa Aviles-Ramos, In Her
Official Capacity; The City of New York; General
Counsel Liz Vladeck, In Her Official and Individual
Capacities; Senior Policy Advisor Sapna Kapoor in Her
Official and Individual Capacities,

Defendants.

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WHEREAS the Plaintiffs commenced this action by filing a complaint on or about
November 27, 2024;

WHEREAS the Plaintiffs filed an amended complaint on or about January 30, 2025;

WHEREAS the Plaintiffs now desire to dismiss with prejudice any and all claims that
were brought or could have been brought in this proceeding, except the following claims, which
the parties agree are to be dismissed without prejudice, namely, (1) a claim for reasonable
attorneys' fees, expenses, and costs in the respective, related administrative actions; (2) a claim for
reasonable attorneys' fees, expenses, and costs in the within action; and, (3) a claim for interest the

Plaintiffs allege is due and owing on each payment made by the Defendants to the Plaintiffs subsequent to the filing of the Complaint, each claim of which the Defendants oppose, which the Plaintiffs to desire to dismiss without prejudice, without disbursements, costs, or expenses to either party, and without admitting any fault or liability;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), by and between the undersigned, that


1. The above-referenced action, and all claims herein are hereby dismissed *with prejudice* against all the Defendants; except that the Plaintiffs' enumerated claims (1) to (3), inclusive for interest and attorneys' fees, costs, and expenses are dismissed without prejudice.
2. Nothing herein shall limit the Defendants' opposition to any and all requests for interest for all, attorneys' fees, costs, or expenses. This lack of defense limitations also includes but is not limited to Plaintiffs' claim for interest to which they assert is due owing.
3. Nothing contained herein shall be deemed to be an admission by any defendant that it has in any manner or way violated plaintiff's rights, or the rights of any other person or entity, as defined in the constitutions, statutes, ordinances, rules, or regulations of the United States, the State of New York, or the City of New York or any other rules, regulations, or bylaws of any department or subdivision of the City of New York. This stipulation shall not be admissible in, nor is it related to, any other litigation or settlement negotiations, except if and as necessary to enforce this stipulation and order.
4. Nothing contained herein shall be deemed to constitute a policy or practice of the City of New York or any agency thereof.
5. This stipulation shall be binding upon the parties immediately upon signature and filing with the Court.

Dated: July 21, 2025
New York, New York

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By: 
 Alfred Miller, Jr.
 Assistant Corporation Counsel

SO ORDERED:

HON. RACHEL P. KOVNER
UNITED STATES DISTRICT JUDGE

Dated: _____, 2025